

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS,

Plaintiff,

v.

Case No. 3:23-cv-01877-L

PERKINS COIE LLP,

Defendant.

**PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION
(RULING REQUESTED BY OCTOBER 31, 2023)**

Plaintiff, the American Alliance for Equal Rights, moves for a preliminary injunction against Defendant, Perkins Coie LLP. *See* Fed. R. Civ. P. 65. For decades, Perkins has operated “diversity fellowships” that bar certain applicants based on race. Plaintiff has at least one member who is ready and able to apply for the fellowship in 2024, but cannot because he is the wrong race. Section 1981 prohibits Defendant’s racial discrimination. 42 U.S.C. §1981; *see Domino’s Pizza, Inc. v. McDonald*, 546 U.S. 470, 474 (2006). This Court should hold that Perkins’ fellowship likely violates §1981 and enjoin Perkins from opening the application process, selecting fellows, or otherwise operating the fellowship as currently structured pending further order of the Court.

Time is of the essence. Perkins will open the application process in November 2023 and will select fellows in January 2024. To prevent irreparable harm and provide enough time for appellate review, the Alliance respectfully asks this Court to resolve this motion **by October 31, 2023**.

Dated: August 28, 2023

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Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I could not confer with opposing counsel because, when this time-sensitive motion was filed, no counsel had entered an appearance or contacted the Alliance. Perkins appears to oppose the requested relief because its spokesperson issued a press statement saying that the firm is “a leader in efforts to promote diversity, equity, and inclusion in the legal profession,” that its “commitment to those values remains steadfast,” and that it “will defend this lawsuit vigorously.” Monnay, *Perkins Coie, Morrison Foerster Sued Over DEI Programs*, Bloomberg Law (Aug. 22, 2023), perma.cc/546V-A9LJ.

/s/ Cameron T. Norris

CERTIFICATE OF SERVICE

On August 28, 2023, I e-filed this motion and attachments with the Court and emailed it to Defendant’s general counsel. I will also send this motion and attachments, via certified mail, to Defendant along with the other case-opening documents.

/s/ Cameron T. Norris